

DC

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

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DEC - 4 2015  
12-4-2015

THOMAS G BRUTON  
CLERK, U S DISTRICT COURT

Dexter Saffold

Plaintiff(s),

vs.

Village of Evergreen Park  
and Detective Signorelli,  
in his official capacity

Defendant(s).

Case No. 15 CV 10902

Judge Manish Shaw  
Magistrate Judge  
Mary Rowland

FIRST AMENDED

COMPLAINT FOR VIOLATION OF CONSTITUTIONAL RIGHTS

*This form complaint is designed to help you, as a pro se plaintiff, state your case in a clear manner. Please read the directions and the numbered paragraphs carefully. Some paragraphs may not apply to you. You may cross out paragraphs that do not apply to you. All references to "plaintiff" and "defendant" are stated in the singular but will apply to more than one plaintiff or defendant if that is the nature of the case.*

1. This is a claim for violation of plaintiff's civil rights as protected by the Constitution and laws of the United States under 42 U.S.C. §§ 1983, 1985, and 1986.
2. The court has jurisdiction under 28 U.S.C. §§ 1343 and 1367.
3. Plaintiff's full name is Dexter Saffold.

*If there are additional plaintiffs, fill in the above information as to the first-named plaintiff and complete the information for each additional plaintiff on an extra sheet.*

4. Defendant, Detective Signorelli, is  
(name, badge number if known)
- ☒ an officer or official employed by Village of Evergreen  
(department or agency of government)  
Park Police Department or
- ☐ an individual not employed by a governmental entity.

*If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.*

5. The municipality, township or county under whose authority defendant officer or official acted is Evergreen Park, Illinois. As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.
6. On or about November 20, 2013, at approximately 8:00 ☐ a.m. ☒ p.m.  
(month, day, year)  
plaintiff was present in the municipality (or unincorporated area) of Chicago  
\_\_\_\_\_, in the County of Cook,  
State of Illinois, at 6759 S. Stony Island,  
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (*Place X in each box that applies*):

- ☐ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
- ☐ searched plaintiff or his property without a warrant and without reasonable cause;
- ☐ used excessive force upon plaintiff;
- ☐ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☐ failed to provide plaintiff with needed medical care;
- ☐ conspired together to violate one or more of plaintiff's civil rights;

☒ Other:

Gave Chicago police notice that Evergreen Park had issued a warrant for my arrest

7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: *(Leave blank if no custom or policy is alleged):* issuing false arrest warrants in violation of 720 ILCS 5/17-1 (B)
8. Plaintiff was charged with one or more crimes, specifically:  
deceptive practices, the underlying facts being on or around 2/13/12 Plaintiff tendered a check for \$60 to pay a parking ticket. Approximately two weeks later, Plaintiff put a stop payment on that check after concluding he was not at fault.
9. *(Place an X in the box that applies. If none applies, you may describe the criminal proceedings under "Other")* The criminal proceedings
- ☒ are still pending.
- ☐ were terminated in favor of plaintiff in a manner indicating plaintiff was innocent.<sup>1</sup>
- ☐ Plaintiff was found guilty of one or more charges because defendant deprived me of a fair trial as follows \_\_\_\_\_
- ☐ Other: \_\_\_\_\_

<sup>1</sup>Examples of termination in favor of the plaintiff in a manner indicating plaintiff was innocent may include a judgment of not guilty, reversal of a conviction on direct appeal, expungement of the conviction, a voluntary dismissal (SOL) by the prosecutor, or a *nolle prosequi* order.



10. Plaintiff further alleges as follows: *(Describe what happened that you believe supports your claims. To the extent possible, be specific as to your own actions and the actions of each defendant.)*

On or around 12/4/13 Evergreen Park  
police detectives fingerprinted me.

11. Defendant acted knowingly, intentionally, willfully and maliciously.
12. As a result of defendant's conduct, plaintiff was injured as follows:

Incarcerated 15 days in Cook County,  
having to spend Thanksgiving 2013 apart  
from family and friends. Plaintiff suffered  
and continues to suffer emotional distress  
and financial loss as he also was fired because

13. Plaintiff asks that the case be tried by a jury. ☒ Yes ☐ No

he could  
not work  
while he  
was ~~in~~  
incarcerated.

14. Plaintiff also claims violation of rights that may be protected by the laws of Illinois, such as false arrest, assault, battery, false imprisonment, malicious prosecution, conspiracy, and/or any other claim that may be supported by the allegations of this complaint.

**WHEREFORE**, plaintiff asks for the following relief:

- A. Damages to compensate for all bodily harm, emotional harm, pain and suffering, loss of income, loss of enjoyment of life, property damage and any other injuries inflicted by defendant;
- B. ☒ (Place X in box if you are seeking punitive damages.) Punitive damages against the individual defendant; and
- C. Such injunctive, declaratory, or other relief as may be appropriate, including

attorney's fees and reasonable expenses as authorized by 42 U.S.C. § 1988.

Plaintiff's signature: Dexter Saffold

Plaintiff's name (print clearly or type): Dexter Saffold

Plaintiff's mailing address: 737 E. 69<sup>th</sup> St.

City Chicago State IL ZIP 60637

Plaintiff's telephone number: ( ) \_\_\_\_\_.

Plaintiff's email address (if you prefer to be contacted by email): 312-785-8409

15. Plaintiff has previously filed a case in this district. ☒ Yes ☐ No

If yes, please list the cases below.

97 CV 6075, 08 CV 5032  
03 CV 7283, 12 CV 6006  
06 CV 5236, 14 CV 7468

*Any additional plaintiffs must sign the complaint and provide the same information as the first plaintiff. An additional signature page may be added.*